UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

ERICK DIAZ CRUZ,

Plaintiff,

Index No. 20 Civ. 891

v.

JOHN DOE 1, Officer of U.S. Immigration and Customs Enforcement,

Defendant.

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law dated March 17, 2020 and Declaration of Scout Katovich dated March 17, 2020, and annexed exhibits, Plaintiff Erick Diaz Cruz will move this Court, at such convenient time as counsel may be heard, pursuant to Federal Rules of Civil Procedure 26(d)(1) and 45 for an Order permitting Plaintiff to take immediate discovery for the limited purpose of identifying the Doe defendant in this case, and for such other relief as the Court deems appropriate and just.

Dated: New York, New York March 17, 2020

EMERY CELLI BRINCKERHOFF & ABADY LLP

By: /s/
Scout Katovich
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